

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 David A. Perlson (Bar No. 209502)
5 davidperlson@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
7 melissabaily@quinnemanuel.com
8 John Neukom (Bar No. 275887)
9 johnneukom@quinnemanuel.com
10 Jordan Jaffe (Bar No. 254886)
11 jordanjaffe@quinnemanuel.com
12 50 California Street, 22nd Floor
13 San Francisco, California 94111-4788
14 Telephone: (415) 875-6600
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 Plaintiff,

21 vs.

22 UBER TECHNOLOGIES, INC.;
23 OTTOMOTTO LLC; OTTO TRUCKING
24 LLC,

25 Defendants.

26 CASE NO. 3:17-cv-00939-WHA
27 DECLARATION OF ANDREA PALLIOS
28 ROBERTS IN SUPPORT OF PLAINTIFF
WAYMO LLC'S RESPONSE TO
COURT INQUIRY RE UBER'S FAILURE
TO PRODUCE JACOBS LETTER AND
EMAIL

1 I, Andrea Pallios Roberts, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an attorney at Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of RFP Nos. 28-30, 72, 73 and 91
7 from Waymo's First Set of Requests for Productions.

8 3. Attached as Exhibit 2 is a true and correct copy of Expedited Interrogatory Nos. 1,
9 3 and 6 from Waymo's First Set of Expedited Interrogatories.

10 4. Attached as Exhibit 3 is a true and correct copy of Common Interrogatory No. 8
11 from Waymo's Third Set of Common Interrogatories.

12 5. Attached as Exhibit 4 is a true and correct copy of excerpts from the October 2,
13 2017 deposition of A. Padilla.

14 6. Attached as Exhibit 5 is a true and correct copy of a July 25, 2017 letter from A.
15 Roberts to M. Pritt, counsel for Uber.

16 7. Attached as Exhibit 6 is a true and correct copy of a July 3, 2017 email from A.
17 Roberts to E. Takashima, counsel for Uber.

18 8. Attached as Exhibit 7 is a true and correct copy of a July 3, 2017 email from S,
19 Rivera to Special Master J. Cooper, all counsel for Waymo, and all counsel for Uber.

20 9. Attached as Exhibit 8 is a true and correct copy of R. Jacobs' resignation email,
21 with Bates number UBER00326403.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 DATED: December 4, 2017

4 /s/ Andrea Pallios Roberts

5 Andrea Pallios Roberts

6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Andrea Pallios Roberts.

9

10 /s/ Charles K. Verhoeven

11 Charles K. Verhoeven